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December 21, 2020

**VIA CM/ECF**

The Honorable Joel Schneider  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building  
& U.S. Courthouse  
4th & Cooper Streets  
Camden, New Jersey 08101

**Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*,  
U.S. District Court for the District of New Jersey; Case No. 1:19-md-02875-  
RBK-JS**

Dear Judge Schneider:

In accordance with the Court's December 2, 2020 Order (Dkt. 647), as modified by agreement of the parties with the Court's written approval on December 17, 2020, the parties hereby serve the attached validation protocol for entry by the Court. The attached validation protocol is agreed to by the Plaintiffs and Teva, to be used for completing Teva's review of the documents in the custodial files of Teva's agreed custodians.

The ordered protocol provided for required review of 25% of the highest scoring documents identified by the CMML system in the custodial files of Teva's agreed custodians. Teva has expressed its position that the provision requiring review of no less than 25% of the highest scoring documents identified by the CMML system is unnecessary and beyond reasonable requirements, but in the spirit of compromise and in order to facilitate compliance with the Court's deadlines, Teva agrees to the 15% review provision, which Teva maintains is unnecessary and beyond reasonable requirements, under the current circumstances. Plaintiffs disagree with Teva's position and maintain that a review of 25% of the highest scoring documents identified by the CMML system in the custodial files of Teva's agreed custodians is necessary and reasonable, but in the spirit of compromise and to facilitate compliance with the Court's deadlines, Plaintiffs agree to the 15% provision under the current circumstances. The parties notify the Court that no outstanding disputes exist with respect to the attached protocol.

Pursuant to paragraph 4 of the Court's December 2, 2020 Order (Dkt. 647), the proposed date for completion of the Teva Defendants' document production and service of Teva's list of

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non-responsive documents to Plaintiffs is February 15, 2021. This is a target date and is dependent on the validation steps required in the Protocol.

The parties once again thank the Court for its time and careful consideration of these issues.

Respectfully,

**GREENBERG TRAURIG, LLP**

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